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Attorneys for Defendants

XINGKE ELECTRONICS (DONGGUAN) CO.,
 LTD. Formerly known as SINCO ELECTRONIC
 (DONGGUAN) CO. LTD., MUI LIANG TJOA
 aka ML TJOA, NG CHER YONG aka CY NG,
 and LIEW YEW SOON aka MARK LIEW

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

SINCO TECHNOLOGIES PTE LTD.,

Plaintiff,

vs.

SINCO ELECTRONICS (DONGGUAN) CO.,
 LTD.; XINGKE ELECTRONICS
 (DONGGUAN) CO., LTD.; XINGKE
 ELECTRONICS TECHNOLOGY CO., LTD.;
 SINCOO ELECTRONICS TECHNOLOGY
 CO., LTD.; MUI LIANG TJOA (an
 individual); NG CHER YONG aka CY NG (an
 individual); and LIEW YEW SOON aka
 MARK LIEW (an individual),

Defendants.

Case No. 3:17-CV-05517-EMC

Action Filed: September 22, 2017

**STIPULATION AND [PROPOSED] ORDER
 AMENDING PROTECTIVE ORDER**

Judge: Honorable Edward M. Chen

Trial: November 1, 2021

1 Plaintiff SINCO TECHNOLOGIES PTE LTD. ("SinCo") and Defendants MUI LIANG
 2 TJOA, NG CHER YONG, LIEW YEW SOON, and XINGKE ELECTRONICS (DONGGUAN)
 3 CO., LTD. ("Xingke") (collectively, "Defendants") (hereinafter collectively "Parties"), through
 4 their respective attorneys of record, file this Joint Stipulation and Proposed Order by which the
 5 Parties memorialize their agreement that the Stipulated Protective Order entered in this action on
 6 **January 14, 2019** (the "Protective Order"), should be amended with respect to the provisions
 7 relating to the disclosure of CONFIDENTIAL-ATTORNEY'S EYES ONLY Information or Items
 8 to jury or trial consultants. [ECF 124]

9 ACCORDINGLY, IT IS HEREBY STIPULATED by and between the Parties, through their
 10 respective counsel of record, that Section 7.3 of the Protective Order should be deleted in its entirety
 11 and restated as follows:

12 "7.3 Disclosure of "CONFIDENTIAL - ATTORNEY'S EYES ONLY" Information or
 13 Items. Unless otherwise ordered by the court or permitted in writing by the Designating Party, a
 14 Receiving Party may disclose any information or item designated CONFIDENTIAL -
 15 ATTORNEY'S EYES ONLY only to:

16 a) the Receiving Party's Outside Counsel of Record in this action, as well as employees of
 17 said Outside Counsel of Record to whom it is reasonably necessary to disclose the information for
 18 this litigation and who have signed the "Acknowledgment and Agreement to Be Bound" that is
 19 attached hereto as Exhibit A;

20 b) Experts of the Receiving Party other than Professional jury or trial consultants of the
 21 Receiving Party (1) to whom disclosure is reasonably necessary for this litigation, (2) who have
 22 signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A), and (3) as to whom the
 23 procedures set forth in paragraph 7.4(a), below, have been followed;

24 c) Professional Jury or trial consultants of the Receiving Party (1) to whom disclosure is
 25 reasonably necessary for this litigation, (2) who have signed the "Acknowledgment and Agreement
 26 to Be Bound" (Exhibit A), (3) as to whom the procedures set forth in paragraph 7.4(a)(1)-(3), below,
 27 have been followed along with a disclosure of all work in the last five years that the Professional
 28 Jury or trial consultant has done for any law firm that has represented any party to this

1 action or work done by the Professional Jury or trial consultant for any party or witness to this
2 litigation in the last five years, with a brief description of the work done and amount of money
3 received, if any;

4 d)the Court and its personnel;

5 e)court reporters and their staff and

6 f) Professional Vendors to whom disclosure is reasonably necessary for this litigation and who
7 have signed the "Acknowledgment and Agreement to Be Bound" (Exhibit A); and

8 g)the author or recipient of a document containing the information or a custodian or other
9 person who otherwise possessed or knew the information."

10 **IT IS SO STIPULATED**, through Counsel of Record.

11
12 Dated: September 2, 2021

Respectfully submitted,

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14 ARNOLD & PORTER KAYE SCHOLER LLP

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16 By: Is/ Douglas A. Winthrop

17 DOUGLAS A. WINTHROP

18 Attorneys for Defendant

19
20 Dated: September 2, 2021

ROPERS, MAJESKI, KOHN & BENTLY LLP

21
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23 By _____

24 LAEL D. ANDARA

25
26 *Attorneys for Plaintiff*

27 SINCO TECHNOLOGIES PTE LTD.
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2 **PURSUANT TO STIPULATION, IT IS SO ORDERED AS MODIFIED.**

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4 Dated: September 7, 2021


Honorable Joseph C. Spero

